
From: Waye, Don
To: Henning, Alan; allison.castellan@noaa.gov; Wu, Jennifer; Carlin, Jayne
Sent: 2/10/2015 4:01:49 PM
Subject: Questions about one of Peter's comments - merging "Closing the Gaps" versions
Attachments: Closing the Gap on Forestry Management Measures-v9 2-5-2015 clean version JL EDITS.docx

Tech Team,

Given Peter's comments below and in his mark-up, do you think I should weave into our Closing the Gaps document what he says about sediment and turbidity? (See section on non-fish-bearing streams on p. 2.)

Also, Peter suggests we remove all references to PCW in favor of broader statements on meeting WQS. Thoughts?

From: Henning, Alan
Sent: Tuesday, February 10, 2015 2:51 PM
To: Waye, Don
Subject: FW: The "Forestry Gaps" Document - with attachment

From: Jeffrey Lockwood - NOAA Federal [mailto:jeffrey.lockwood@noaa.gov]
Sent: Monday, February 09, 2015 9:24 AM
To: Henning, Alan
Subject: Fwd: The "Forestry Gaps" Document - with attachment

I'll call you but I wanted you to see my draft comments first.

On Fri, Feb 6, 2015 at 6:03 PM, Jeffrey Lockwood - NOAA Federal <jeffrey.lockwood@noaa.gov> wrote:
This is not what I discussed with Christine - that was for the disapproval, and this is for next steps. I have not been involved with this and have some important comments on this (see attachment). I took out some of the comment balloons to make it easier to see what I was adding. Here are the main issues:

- The draft is confused about the "protecting cold water" (PCW) provision and how it works. For example, it's a narrative criterion, not a standard. And it only applies where T&E salmonids currently exist. I have tried to clarify this.
- I don't understand how all the water quality concerns we had regarding buffers got jammed into the single issue of the PCW criterion - maybe because that's what the state is working on now? Buffers are also relevant to other aspects of water quality such as protecting shade to meet other aspects of the temperature standard, meeting the sediment and turbidity standard, and recruiting wood into streams to help meet beneficial uses.
- The draft makes it sound like we haven't determined yet if legacy forest roads are causing problems - I thought we have, so I suggested changing that.
- The landslide language needed some work in terms of what our concerns are and what measures would fix them. I agree with the commenter that as written the voluntary measures looked mandatory so I tried to address that.
- I made some suggestions on herbicides but I don't know the issue well enough to address all the comments about adequacy of the labels - maybe Rob Walton should look at that part? I'm hoping someone at EPA is reviewing this who understands the issue better, although Christine was relying on us to weigh in on labels.

Do you want to send these to Allison?

Jeff Lockwood



On Fri, Feb 6, 2015 at 8:19 AM, Kim Kratz - NOAA Federal <kim.kratz@noaa.gov> wrote:
We should weigh in.

----- Forwarded message -----

From: **Allison Castellan - NOAA Federal** <allison.castellan@noaa.gov>
Date: Friday, February 6, 2015
Subject: Fwd: The "Forestry Gaps" Document
To: Kim Kratz - NOAA Federal <Kim.Kratz@noaa.gov>
Cc: Joelle Gore - NOAA Federal <Joelle.Gore@noaa.gov>, Kris Wall - NOAA Federal <kris.wall@noaa.gov>

Kim--

We'd be interested in any additional thoughts you and your team may have on the "gaps" document. The latest version EPA R10 has been working on with Dennis/Will and the state is attached. Will had flagged a few things he wanted to look into further to ensure consistency with other NMFS efforts. I have not had a chance to review this version yet to know how its changed from earlier versions or how well it's incorporated prior comments but wanted to share with you given the short turn around.

We've been asked to provide "fatal flaws" and recommend specific lang. to correct **by COB Tues Feb. 10th**. I imagine we'll likely need a few additional days to work on any potential differences in the comments after everyone weighs in but folks would like to finalize this as soon as possible.

Please send along any comments you may have in the "fatal flaw" category.

Thanks,
Allison

----- Forwarded message -----

From: **Psyk, Christine** <Psyk.Christine@epa.gov>
Date: Thu, Feb 5, 2015 at 5:45 PM
Subject: The "Forestry Gaps" Document
To: "Carlin, Jayne" <Carlin.Jayne@epa.gov>, "allison.castellan@noaa.gov" <allison.castellan@noaa.gov>, "Henning, Alan" <Henning.Alan@epa.gov>, "Wu, Jennifer" <Wu.Jennifer@epa.gov>, "Waye, Don" <Waye.Don@epa.gov>, "Byrne, Jennifer" <Byrne.Jennifer@epa.gov>, "Sweeney, Stephen" <Sweeney.Stephen@epa.gov>
Cc: Joelle Gore - NOAA Federal <Joelle.Gore@noaa.gov>, "Hall, Lynda" <Hall.Lynda@epa.gov>

As promised, here are two versions of the latest Draft Internal "Forestry Gaps" documents. One is a clean version with all the revision incorporated and the other is with redline/strikeout and oodles of very long comments, including from me based on input some of you provided. I did make one change today which was to add "Internal Document" and today's date to the header.

So, end of the day Tuesday, 2/10/2015 is the requested deadline for your input. Thanks.

Christine Psyk, Associate Director
EPA Region 10, OWW
[206-553-1906](tel:206-553-1906)

Psyk.christine@epa.gov

--

~ ~ < > ~ ~ > < ~ ~ < > ~ ~

Allison Castellan
Coastal Management Specialist
Office *for* Coastal Management N/OCM6
National Oceanic and Atmospheric Administration, SSMC4
Silver Spring, MD 20910
Phone: 301-563-1125
Fax: 301-713-4004
allison.castellan@noaa.gov
http://coast.noaa.gov

--

Kim Kratz, Ph.D.
*Assistant Regional Administrator
Oregon/Washington Coastal Area Office
NOAA Fisheries West Coast Region
U.S. Department of Commerce
Office: 503-231-2155*

www.westcoast.fisheries.noaa.gov



NOAA FISHERIES
West Coast Region